

# EXHIBIT

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Declaration of Peter C. Salerno  
In Support of Defendant Yassin Kadi's Motion  
To Exclude the Testimony of Victor Comras

03 MDL 1570

July 31, 2023

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U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to  
File No.

315N-NY-289392

New York Office  
June 2, 2004

## Co-operating Witness Interview

On 1/13/2004, a co-operating witness, hereafter referred to as "source", was interviewed about an individual named Yasin Al-Kadi. The source advised the following:

The source advised that Yasin Al-Kadi is from the Dosari (phonetic) tribe in Saudi Arabia and that he may use the alias Abu Khalid. Although the source never directly worked with Al-Kadi, he (source) saw Al-Kadi twice, circa 1993-94, at one of Osama Bin Laden's guesthouses located in the Riyadh City section of Khartoum, Sudan. The source believes that Al-Kadi is not a member of Al-Qaida, but was definitely a noteworthy individual who supported jihad.

The source advised that Al-Kadi was friends with two Al-Qaida members who were involved in the financial aspects of the group. These two individuals were Abu Unaith Al-Saudi (of Moroccan roots) and Abu Hammam Al-Saudi. The source advised that both these individuals purchased weapons for Al-Qaida during the war in Afghanistan and maintained an office in Peshawar, Pakistan circa 1989. According to the source, this office was located inside the offices of the Islamic Relief Organization (IRO). The source further advised that the manager and person who ran the IRO at the time was Wael Julidan whose alias was Abu Al-Hasan Al-Madani. According to the source, Julidan was one of Bin Laden's closest friends at the time. The source was told by Abu Fadi Al-Makki that Al-Kadi would bring donated money from the Gulf area, mainly Saudi Arabia, to Al-Qaida which was used to purchase weapons in Jalalabad, Afghanistan.

The source advised that Al-Kadi also brought money to Khartoum for Al-Qaida. According to the source, some of this money was used to help finance the building of the Damazin to Kurmuk road which was started at the end of 1989. Furthermore, the source advised that Abu Unaith and Abu Hammam were involved in establishing the Wadi Al-Aqiq company.

The source advised that Al-Kadi also supported Al-Haramain in Zagreb, Croatia during the conflict in Bosnia. Like

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Afghanistan and Sudan, Al-Kadi brought donations from Saudi Arabia and other Gulf countries to Croatia to support the jihad. The source was not sure if any of the money was from Al-Kadi personally. Aside from money, Al-Kadi was also responsible for shipping tapes and books about jihad and Islam to Al-Haramain. The source advised that these shipments were sent to Croatia and forwarded to Bosnia for distribution. According to the source, some of the material remained in Croatia and was distributed to Arab and Bosnian Muslims residing there.

Furthermore, the source advised that while he was in Zagreb, Croatia, Abu Ayman Al-Sudani (not the Abu Ayman Al-Sudani who is related to Mohamed Suliman Al-Naffi) told him that Al-Kadi was one of the individuals who financially supported Al-Haramain. The source advised that Abu Ayman is originally from Kassalia, Sudan and was one of the individuals who managed the Al-Haramain office in Zagreb. The source believes that Abu Ayman was not an Al-Qaida member but did support the group. To clarify the management structure of Al-Haramain in Zagreb, the source advised that the Emir of the office was a Saudi named Al-Sheikh Agil (phonetic) and under him was an individual named Al-Sheikh Adnan Ar-Roor (phonetic). According to the source, Abu Ayman worked under Agil, who he (source) described as having a wandering eye, and Ar-Roor. However, Abu Ayman told the source that the person who actually ran Al-Haramain was Saudi Prince Faisal Al-Turki.

The source advised that Ar-Roor was originally from Syria and was also involved in financing jihad in Afghanistan and Bosnia. According to the source, Ar-Roor was not an Al-Qaida member. However, Ar-Roor is an Islamic scholar who gave a lot of lectures about jihad and was good friends with Al-Kadi.

Finally, the source advised that the money that was being sent to Pakistan by Al-Kadi was done through the Hawala system and not traditional banks. The source was not sure about the method by which money was being sent to Croatia.